

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)	
UNITED STATES OF AMERICA)	
)	
v.)	CRIMINAL NO. 04-30046-MAP
)	
THEODORE JARRETT, <i>et al.</i>)	
_____)	

DEFENDANT JARRETT'S MOTION FOR ENLARGEMENT OF TIME

Defendant Theodore Jarrett ("Mr. Jarrett") respectfully requests that the time for filing his motion regarding the loss calculation for purpose of his sentencing be enlarged to July 28, 2006. The grounds for this motion are as follows:

1. Mr. Jarrett's sentencing is scheduled for October 6, 2006.
2. The requested additional time is necessary so that counsel for Mr. Jarrett and counsel for the other defendants may confer with one another regarding the loss calculation to determine whether they can provide the Court with a methodology underlying the calculation that is acceptable to all of the defendants with the goal of eliminating and/or narrowing unnecessary or duplicative issues.
3. The requested additional time for filing the motion is also necessary so that a full accounting of the alleged loss amount can be made by the defendant and/or any expert the defendant might retain.
4. Counsel for Mr. Jarrett has communicated with counsel for the United States and for the following defendants, all of whom concur in counsel's request for enlargement of time: Albert Innarelli (Moirra Buckley and Jim Bergenn); Joseph Sullivan

(Thomas Kokonowski); Wilfred Chingasie (Terry Nagel); Lawrence Lynch (Kevin Murphy); Mark McCarthy (Robert Santaniello).

Respectfully Submitted,
THEODORE JARRETT
By his Attorneys,

/s/ Maria R. Durant

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Dated: May 24, 2006

CERTIFICATION OF COMPLIANCE WITH LOCAL RULES 112.1, 7.1(A)(2)

The undersigned counsel hereby certifies that she has conferred with Attorney William Welch prior to filing this motion, and that he has assented to the requested extension on behalf of the United States.

/s/ Maria R. Durant

Maria R. Durant

Dated: May 24, 2006

CERTIFICATE OF SERVICE

The undersigned counsel hereby certifies that a true and correct copy of this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on May 24, 2006.

/s/ Maria R. Durant

Maria R. Durant

Dated: May 24, 2006